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Attorneys for Defendant
AT & T Mobility Services LLC

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LISA LO CURTO, *on behalf of herself and all
others similarly situated,*

Plaintiff,
-against-
AT & T MOBILITY SERVICES LLC,
Defendant.

13 Civ. 04303 (AT)(KNF)

DECLARATION OF VALERIE ANDERS

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I, Valerie Anders, make the following Declaration:

1. I have personal knowledge of the facts contained in this Declaration. If called and sworn as a witness, I would testify competently to these facts. I understand that this Declaration is being provided to attorneys for AT&T Mobility Services LLC as part of their defense of the lawsuit LoCurto v. AT&T Mobility Services LLC. I understand that this Declaration may be used for a variety of purposes to defend AT&T Mobility in that litigation.

2. I make this Declaration entirely of my own free will and choice. No promises of benefits or threats have been made to me to persuade me to sign it. I read and understand the "Who We Are" statement provided to me by the Company's lawyers prior to signing this Declaration.

3. I work as a National Distribution Account Executive ("NDAE") for AT&T Mobility. I am assigned to 11 Target and Apple stores in the St. Louis, Missouri, area. I have held a retail account executive position for 12 years, but from 2001 to 2005 I worked with local dealers rather than national retailers.

4. I see my job as similar to running my own business. My goal is to grow the business of my retailers so that they make money while bringing in more revenue for AT&T Mobility. Mobility offers me resources to do my job, such as training and documents, but I decide how to grow the business of my retailers, whether it is through training, coaching, observing, side-by-side selling, leading by example, or other methods.

5. To grow AT&T's business at my assigned stores, I must take responsibility for their success. It is important for me to ensure that they are properly trained and know the advantages of selling AT&T over other wireless carriers. I must be aware of AT&T's competitive challenges and how to face them. I also serve as my store's point of contact for AT&T, so that they have a resource for questions or customer issues.

6. My work with local dealers was very different than my current work at national retailers. At the local dealer stores, I worked directly with the store owners, and had to get their buy-in on ways to grow their business. Because local dealer stores already believe in AT&T Mobility products, I did not have to convince them to sell AT&T over other carriers. Instead, I could focus on improving their business. Some local dealers sought my involvement

in the full range of their business, including how they should pay their sales associates. My interaction with sales associates was also different, because they work on commissions and are motivated to make additional money.

7. In contrast, at my national retailers, some employees do not work on commissions, or if they do, they will earn the same commission whether they sell AT&T or another carrier. Therefore, it is more important for me to build a relationship with them to motivate them to sell AT&T. If sales associates cannot count on me or do not trust me, then they are not likely to sell AT&T's products.

8. I plan my schedule for store visits for the week based on my other commitments and the productivity of my stores. I am expected to visit my most productive stores more regularly than my other stores, but I use my discretion to decide which other stores may be worthy of additional visits. For example, I have decided that although a store is not "prime," it has good potential, and will visit it weekly. I decide what actions to take to benefit my business. I typically spend at least an hour at each store visit, except for my Apple stores, where I am required to spend two hours. Sometimes I decide to "blitz" my Target stores with quick visits to address a particular issue or check to make sure everything is in order. Except for the minimum requirement at my Apple stores, the length of my visits is up to my discretion and is often dependent on what I encounter once I arrive at the store.

9. During my visits, I typically meet with the lead manager on duty and anyone else in the electronics department, including sales associates. I use my visits to ensure that the employees of my stores have a good understanding of AT&T products and services and can share with customers the AT&T advantages, differences between devices and models, and rate plans. I also want to make sure they can effectively sell the products and use transitioning statements with customers. I check employees' understanding with quizzes, tests and coaching. When my stores hire new associates, I train them on the basics, which could be as simple as how to send text messages. I enjoy that each visit is different. Through my visits, it is my responsibility to ensure that sales associates really understand what AT&T has to offer, because they are the voice for AT&T when I am not in the store.

10. I set my own schedule, within store hours. For example, sometimes I decide to start work at 11:30 a.m. and work through the evening. Other times, if I have a personal appointment in the afternoon, I will start earlier. I typically spend eight hours a day

conducting store visits for four days a week, and spend one day in the office. Sometimes I will decide to work longer hours to take training or create documents because I believe it will help me improve at my job. I work an average of 45 hours per week.

11. I provide both one-on-one and group training to store employees, but one-on-one training is more common. I sometimes suggest group training to a store so I can cover an issue with everyone at once with fewer distractions. I typically have an agenda for training when I arrive at a store, but I will adjust it depending on what I encounter. For example, I recently visited a store and saw an employee I had not seen in a while, so I took the opportunity to refresh the employee on some points that were not part of my agenda. I also choose training based on the sales results of my stores. For example, if a store is selling a lot of Apple phones but not Android, I would train them on Android smart phones to become more comfortable with the devices.

12. I vary my training and coaching from employee to employee, depending on their strengths and weaknesses. I sometimes use quizzes to find their strengths or to test their knowledge after I have provided training. I primarily use documents from AT&T's training library, but sometimes I create my own materials, including quizzes. I have offered associates a small reward, like coffee or lunch, for getting all of the questions right.

13. I give my accounts goals for their sales but have to find ways to motivate employees to meet those goals because additional sales do not always impact employees' compensation. When I communicate goals to my stores, I ask them how I can help achieve the goal and try to build the relationship in a way that they will want to meet the goal. I also encourage store employees to treat their store as their own business.

14. I regularly engage in side-by-side selling with sales associates. I typically let the associate start working with the customer but step in when needed and offer the salesperson encouragement and extra help. I also coach sales associates and give them feedback after they complete an interaction with a customer.

15. I provide my stores with feedback on their staffing if I see customers who walk out because no one was available to help. I also give feedback to managers on their sales associates, because I want employees to be the best they can be. I may work with an employee first on an issue and then bring it to the attention of a manager to work with them further.

16. I am required to answer my phone outside of my normal work hours, although I can have other team members or my supervisor take my calls if I know I will be unavailable. It is important for me to be available to my locations while they are open so they feel like they can trust me to answer their questions. I know that if my locations are calling me in the evenings it is because they need my assistance.

I have read this Declaration and declare that it is true and correct under penalty of perjury under the laws of the State of Missouri and the United States of America and that it was signed by me on January 13, 2014, at St. Louis, Missouri.



Signature